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# GAGE SPENCER & FLEMING LLP

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May 25, 2012

## Via Facsimile

The Honorable Debra Freeman  
 United States Magistrate Judge  
 Southern District of New York  
 Daniel Patrick Moynihan  
 United States Courthouse  
 500 Pearl Street  
 New York, NY 10007-1312

USDC SDNY  
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Re: *WagerLogic Limited v. Paramount Digital Entertainment,*  
*Civil Action No. 11-CV-4310*

Dear Judge Freeman:

We represent Paramount Digital Entertainment ("Paramount") in the above-referenced matter.

In accordance with Your Honor's request for the parties to advise the Court by letter regarding consent to amended pleadings, Paramount respectfully submits that it advised opposing counsel yesterday by email that Paramount will consent to WagerLogic's proposed amended complaint in the form that it was provided to Paramount on April 11, 2012. However, as Paramount advised opposing counsel yesterday, Paramount's consent is conditional on the representation that WagerLogic Limited, Cryptologic Limited, and Gaming Portals Limited will likewise consent to Paramount amending its Answer, Statement of Counterclaims and Third-Party Complaint, and that those three entities as well as WagerLogic Casino Software Limited will accept service of Paramount's amended pleading through Mr. Kill's firm.

Additionally, as Paramount advised opposing counsel yesterday, Paramount respectfully reserves all rights and remedies, and has expressly reserved the right to move for costs and sanctions arising from, among other things, the representations and submissions made to the Court prior to April 11, 2012. We have also requested that opposing counsel identify whether it (or another firm) will represent Amaya Gaming Group ("Amaya") and whether Amaya will consent to accept service of Paramount's proposed Third-Party Complaint against it.

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Finally, Paramount respectfully requests a scheduling conference at Your Honor's earliest convenience to discuss proceeding with targeted discovery, as the Court has suggested in prior conferences, and to establish a new discovery schedule.

Respectfully submitted,

A handwritten signature in black ink, reading "Sara Daugherty". The signature is fluid and cursive, with a long horizontal stroke extending from the end of the name.

Sara J. Daugherty

cc: Lawrence Kill, Esq.  
Jeffrey Glen, Esq.  
*Counsel for Plaintiff and Third-Party Defendants*